

Environmental Resources Management, inc.

355 Springdale Drive • Exton, Pennsylvania 19341 • (215) 524-3500 • Telex 4900009249

15 August 1988

37 16859
ORIGINAL
(Part)

Suzanne Billings
EPA Project Coordinator
USEPA Hazardous Waste Enforcement Branch
841 Chestnut Building
Philadelphia, PA 19107

Re: EPA Comments on the Draft Remedial Investigation Site
Operations Plan for the Eastern Diversified Metals Site,
Hometown, PA.

Dear Suzanne:

ERM has recently received the EPA comments on the draft Remedial Investigation Site Operations Plan (RISOP) for the Eastern Diversified Metals site. As you may know, ERM based the RISOP and the schedule for the Remedial Investigation (RI), on the approved Work Plan for the EDM Remedial Investigation/Feasibility Study (RI/FS). Although we had informally discussed some of the EPA comments, ERM was surprised by the nature and extent of the written comments, the impact that they would have on the ultimate design of the RI/FS, and the reopening of issues already decided in the development of the Work Plan. At this point, we are finding that a significant effort will be necessary to determine the final revisions to be made, and to make those revisions.

We are presently in communication with some members of the EPA peer review team in an attempt to gain a better understanding of the comments. However, the effort required to address such extensive comments, precludes the reasonable expectation of a final RISOP submission on September 7, 1988.

ERM feels that it is most important to go through only one revision of this document so that the Remedial Investigation can proceed during the 1988 fall season, as planned. For this reason, ERM, on behalf of the EDM site Respondents, requests an extension of the final RISOP due date to September 30, 1988. This will allow

AR300888

An affiliate of the Environmental Resources Management Group with offices worldwide




EPA received 8/16/88 J.B.

Suzanne Billings
EPA Project Coordinator
USEPA Hazardous Waste Enforcement Branch
15 August 1988
Page 2

ORIGINAL
(Red)

for the detailed discussions between ERM and EPA that will now be necessary due to the nature of EPA's comments, and document revisions, which will result in a mutually acceptable RISOP for this project.

Sincerely,


Marilyn A. Hewitt
Project Coordinator

cc: William D. Powers, Esquire
Michael W. Steinberg, Esquire
Bruce H. Rapp
Richard Beldner, Esquire
Benjamin G. Stonelake, Esquire

AR300889

The
ERM
Group